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STANFORD UNIVERSITY SCHOOL OF MEDICINE
Department of Genetics

August 25, 1970

Mr. Jonathan Spivak
Wall Street Journal
Washington DC Office

Re: Food Additives

Dear Mr. Spivak--

I appreciated your piece in today's Journal, which was very much in the Spivak tradition of reporting fairly on all sides of controversial questions.* I sometimes despair of explaining the problem of quantitative evaluation of risk to otherwise well-informed policy-makers, not to mention the general public.

As you know, there is great pressure to dismiss the results of over-loading experiments, although they are the only available method of estimating risks at the level of one per hundred or thousand consumers. The fact that one can push an experimental dose below the level of visi-bility in an experiment with a few hundred animals does not make it in fact "toxicologically insignificant".

The Journal is the one vehicle I can visualize being able 1) to reach the relevant audience, and 2) to be quite willing to use graphic illustrations to convey a quantitative problem. I hope you will follow this up some time.

There are, needless to say, many opportunities for mischief on either side of the tightrope, and it may indeed be true that absurd restrictions will sometime be imposed in the name of Delaney. I do not believe myself that this has happened so far.

Did you challenge Dr. Hazleton to name one chemical that would induce cancer by feeding that he was confident should be labelled as such an absurdity?

I should comment, finally, that the Delaney amendment, as such, does not legally apply to DDT and other pesticide residues. For such materials, the Secretary is enjoined to establish reasonable standards of safety, but is left a discretionary judgment in evaluating this which is denied to optional food additives by the Delaney act.

Sincerely,

Joshua Lederberg

*but the headline!:

Subjective? The complaint is that "Delaney" is too (narrowmindedly?) objective.